

# Michael Faillace & Associates, P.C.

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January 2, 2020

**VIA ECF AND EMAIL**

Honorable Katherine Polk Failla, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

**Re: Ruiz Ortega et al v. Ambrosia Bakery Café Inc. et al**  
**Case No. 18-cv-2207 (KPF)**

Dear Judge Failla,

Plaintiffs write to respectfully request an extension of the deadline to submit the settlement agreement for Court approval, from the current deadline of January 2, 2020 to January 13, 2020.

As we previously reported to the Court, the parties have agreed in principle on an amount of settlement, subject to agreement by the parties on the schedule of payments. We were overly optimistic in our November 27, 2019 letter (Dkt. No. 83) about the speed with which we could resolve that schedule. The need to gain approval from several defendants who are contributing to the settlement has slowed that process. The parties remain committed to the settlement subject to resolution of these issues. We respectfully request that the Court extend the time to submit the agreement for Court approval. This is the first request for such an extension.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Joshua S. Androphy  
Joshua S. Androphy, Esq.  
*Attorney for Plaintiffs*

cc: Defendants (Via ECF)

Application GRANTED.

Dated: January 2, 2020  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE